

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<i>Caption in Compliance with D.N.J. LBR 9004-1(b)</i> SAUL EWING LLP Stephen B. Ravin, Esquire Turner N. Falk, Esquire One Riverfront Plaza 1037 Raymond Blvd., Suite 1520 Newark, NJ 07102-5426 Telephone: (973) 286-6714 E-mail: stephen.ravin@saul.com turner.falk@saul.com	
<i>Counsel to the Debtors and Debtors in Possession</i>	
In re:	Chapter 11
NEW JERSEY ORTHOPAEDIC INSTITUTE LLC, <i>et al.</i> ,	Case No. 25-11370 (JKS)
Debtors. ¹	(Jointly Administered)

FIRST AND FINAL FEE APPLICATION OF SAUL EWING LLP, COUNSEL TO THE DEBTORS, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM FEBRUARY 1, 2025 THROUGH JULY 16, 2025

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of New Jersey (the “**Local Rules**”), Saul Ewing LLP (“**Saul Ewing**” or the “**Applicant**”), counsel to the debtors and debtors-in-possession (the “**Debtors**”), hereby applies to the Court for its first and final fee application for professional services rendered and reimbursement of actual and necessary expenses incurred for the period February 1, 2025 through July 16, 2025 (the “**Application Period**”)

¹ The last four digits of Debtor New Jersey Orthopaedic Institute LLC’s tax identification number are 3560; the last four digits of Debtor Northlands Orthopaedic Institute LLC’s tax identification number are 9828. The location of both Debtors’ principal place of business and the Debtors’ service address in these Chapter 11 Cases is 504 Valley Road, Suite 200, Wayne NJ 07470.

with its retention as counsel to the Debtors. Saul Ewing requests authorization to be paid by the Debtors \$225,887.50 and \$25,249.40 in expenses incurred during the Application Period.

Attached hereto as **Exhibit A** is the *Order Authorizing Retention of Saul Ewing LLP as Counsel to the Debtors Effective as of February 10, 2025* [D.I. 61]. Attached hereto as **Exhibit B** is a Declaration of Applicant with respect to the compensation request. Attached hereto as **Exhibit C** is a detailed itemization, by project category, of all services performed by the Applicant with respect to these matters during the Application Period. In addition, in accordance with Local Rule 2016-1, set forth below are summaries describing the services performed within each category.

Included in the Application Period are time entries that predate February 10, 2025 (the “**Petition Date**”). Before the Petition Date, the Applicant prepared for the filing of the above-captioned chapter 11 cases by drafting and preparing pleadings related to the Debtors’ bankruptcy and related adversary proceeding. The Applicant has also applied a 50% discount to Non-Working Travel category, as reflected in Category 11 below.

CATEGORY 1: ASSET SALE DISPOSITION.

This category includes all matters relating to the disposition, and other post-petition uses of, property of the estate. Time in this category includes asset valuation and examining potential transactions regarding estate assets. Saul Ewing spent 7.2 hours of attorney time on the foregoing services. Said services have a value of \$5,817.00 for which Saul Ewing is seeking compensation.

Asset Sale Disposition			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	6.2	\$5,332.00
T. Falk	Associate	1.0	\$485.00
Total		7.2	\$5,817.00

CATEGORY 2: BUSINESS OPERATIONS.

This category includes all matters relating to the general operation of the Debtors’ businesses. Saul Ewing spent 24.5 hours of attorney time on the foregoing services. Said services have a value of \$14,030.50 for which Saul Ewing is seeking compensation.

Business Operations			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	8.8	\$7,568.00
T. Falk	Associate	8.5	\$4,122.50
M. Hanamirian	Associate	7.2	\$2,340.00
Total		24.5	\$14,030.50

CATEGORY 3: CASE ADMINISTRATION.

This category includes all matters related to work regarding the administration of the case, including preparing and revising administrative motions and determining case strategies. Saul Ewing spent 105.2 hours of attorney and paraprofessional time on the foregoing services. Said services have a value of \$49,973.00 for which Saul Ewing is seeking compensation.

Case Administration			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	23.4	\$20,124.00
T. Falk	Associate	20.4	\$9,894.00
M. Hanamirian	Associate	61.4	\$19,955.00
Total		105.2	\$49,973.00

CATEGORY 4: CLAIMS ANALYSIS, OBJECTIONS, PROOFS OF CLAIM.

This category includes all time spent in connection with claim and bar date issues. Time in this category includes analyzing proofs of claims filed in the case. Saul Ewing spent 3.1 hours of attorney time on the foregoing services. Said services have a value of \$1,772.00 for which Saul Ewing is seeking compensation.

Claims Analysis, Objections, Proofs of Claim and Bar Date			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	1.1	\$946.00
T. Falk	Associate	1.1	\$533.50
M. Hanamirian	Associate	0.9	\$292.50
Total		3.1	\$1,772.00

CATEGORY 5: CREDITOR INQUIRIES.

This category includes all matters related to communicating with creditors and parties in interest regarding case status and case-related issues. Saul Ewing spent 3.3 hours of attorney time on the foregoing services. Said services have a value of \$1,788.00 for which Saul Ewing is seeking compensation.

Creditor Inquiries			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	0.5	\$430.00
T. Falk	Associate	2.8	\$1,358.00
Total		3.3	\$1,788.00

CATEGORY 6: EMPLOYEE BENEFITS AND PENSIONS.

This category includes all matters related to employee matters or employee benefits, including preparing a wages motion and analyzing wage and benefits payment issues. Saul Ewing spent 0.9 hours of attorney time on the foregoing services. Said services have a value of \$436.50 for which Saul Ewing is seeking compensation.

Employee Benefits and Pensions			
Professionals	Position	Hours	Compensation
T. Falk	Associate	0.9	\$436.50
Total		0.9	\$436.50

CATEGORY 7: EXECUTORY CONTRACTS & UNEXPIRED LEASES.

This category includes all matters related to executory contracts and unexpired leases. Time in this category includes analyzing leases, examining lease-related issues, and drafting a motion to extend the section 365(d) of the Bankruptcy Code deadline. Saul Ewing spent 10.1 hours of attorney time on the foregoing services. Said services have a value \$3,913.50 for which Saul Ewing is seeking compensation.

Executory Contracts			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	1	\$860.00
T. Falk	Associate	0.6	\$291.00
M. Hanamirian	Associate	8.5	\$2,762.50
Total		10.1	\$3,913.50

CATEGORY 8: FEE/EMPLOYMENT APPLICATIONS (SAUL EWING).

This category includes all matters related to the review and preparation of a retention application and fee applications for Saul Ewing. Saul Ewing spent 10.7 hours of attorney time on the foregoing services. Said services have a value of \$4,188.00 for which Saul Ewing is seeking compensation.

Fee/Employment Applications (Saul Ewing)			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	0.7	\$602.00
T. Falk	Associate	2.1	\$1,018.50
M. Hanamirian	Associate	7.9	\$2,567.50
Total		10.7	\$4,188.00

CATEGORY 9: FEE/EMPLOYMENT APPLICATIONS (OTHER PROFESSIONALS).

This category includes all matters related to the review and analysis and filing of retention and fee applications for other professionals in these Chapter 11 Cases. Saul Ewing spent 15.2 hours of attorney time on the foregoing services. Said services have a value of \$6,521.50 for which Saul Ewing is seeking compensation.

Fee/Employment Applications (Other Professionals)			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	1.7	\$1,462.00
T. Falk	Associate	4.2	\$2,037.00
M. Hanamirian	Associate	9.3	\$3,022.50
Total		15.2	\$6,521.50

CATEGORY 10: FINANCING AND CASH COLLATERAL.

This category includes all matters related to financing and cash collateral, analyzing financial projections and examining budgeting in these Chapter 11 Cases. Saul Ewing spent 2.1 hours of attorney time on the foregoing services. Said services have a value of \$1,018.50 for which Saul Ewing is seeking compensation.

Fee/Employment Applications (Other Professionals)			
Professionals	Position	Hours	Compensation
T. Falk	Associate	2.1	\$1,018.50
Total		2.1	\$1,018.50

CATEGORY 11: LITIGATION: CONTESTED MATTERS AND ADVERSE PROCEEDINGS.

This category includes all matters related to litigation. Time in this category includes responding to subpoenas, negotiating a settlement, reviewing an answer and counterclaim, participating in a settlement conference and preparing settlement documents. Saul Ewing spent 106.9 hours of attorney time on the foregoing services. Said services have a value of \$61,306.50 for which Saul Ewing is seeking compensation.

Litigation: Contested Matters and Adversary Proceedings			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	28	\$24,080.00
T. Falk	Associate	72.4	\$35,114.00
M. Hanamirian	Associate	6.5	\$2,112.50
Total		106.9	\$61,306.50

CATEGORY 12: NON-WORKING TRAVEL.

This category includes all matters related to non-working travel, which time is billed at 50% of the time incurred. Time in this category includes traveling to meet with responsible persons for the Debtors to discuss the case. Saul Ewing spent 1.0 hours of attorney time on the foregoing services. Said services have a value of \$(50% - \$430.00) for which Saul Ewing is seeking compensation.

Non-Working Travel			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	1	\$860.00
Total		1	\$860.00
Minus 50% for Non-Working Travel			(\$430.00)
Grand Total		1	\$430.00

CATEGORY 13: PLAN AND DISCLOSURE STATEMENT.

This category includes time related to plan and disclosure statement issues. Time in this category includes assessing the structure of the plan, drafting and revising the plan, and drafting and revising an exclusivity motion. Saul Ewing spent 70.5 hours of attorney time on the foregoing services. Said services have a value of \$37,976.00 for which Saul Ewing is seeking compensation.

Litigation: Contested Matters and Adversary Proceedings			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	14.1	\$12,126.00
T. Falk	Associate	47	\$22,795.00

Litigation: Contested Matters and Adversary Proceedings			
Professionals	Position	Hours	Compensation
M. Hanamirian	Associate	9.4	\$3,055.00
Total		70.5	\$37,976.00

CATEGORY 14: PREPARATION FOR AND ATTENDANCE AT HEARINGS.

This category includes all matters related to preparation for and attendance at hearings. Saul Ewing spent 13.9 hours of attorney time on the foregoing services. Said services have a value of \$9,871.00 for which Saul Ewing is seeking compensation.

Preparation for and Attendance at Hearings			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	13.9	\$9,871.00
Total		13.9	\$9,871.00

CATEGORY 15: STATEMENTS AND SCHEDULES.

This category includes time related to statements and schedules. Time in this category includes analyzing declarations for amended schedules and correspondence in connection to schedules and statements of financial affairs. Saul Ewing spent 19.6 hours of attorney time on the foregoing services. Said services have a value of \$9,641.00 for which Saul Ewing is seeking compensation.

Statements and Schedules			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	1	\$860.00
T. Falk	Associate	17.1	\$8,293.50
M. Hanamirian	Associate	1.5	\$487.50
Total		19.6	\$9,641.00

CATEGORY 16: UST REPORTS, MEETINGS AND ISSUES.

This category includes time related to the preparation of operating reports and other information required by the UST or the Court. Time in this category includes reviewing documents in preparation of the 341 meeting, attending the 341 meeting, preparing monthly operating reports, and corresponding with the UST. Saul Ewing spent 27.5 hours of attorney time on the foregoing services. Said services have a value of \$15,663.50 for which Saul Ewing is seeking compensation.

UST Reports, Meetings and Issues			
Professionals	Position	Hours	Compensation
S. Ravin	Partner	10	\$8,600.00
T. Falk	Associate	8.6	\$4,171.00
M. Hanamirian	Associate	8.9	\$2,892.50
Total		27.5	\$15,663.50

CATEGORY 17: UTILITIES.

This category includes time related to utilities, including drafting and revising a utilities motion. Saul Ewing spent 4.2 hours of attorney time on the foregoing services. Said services have a value of \$1,541.00 for which Saul Ewing is seeking compensation.

Utilities			
Professionals	Position	Hours	Compensation
T. Falk	Associate	1.10	\$533.50
M. Hanamirian	Associate	3.10	\$1,007.50
Total		4.2	\$1,541.00

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EXPENSES.

Saul Ewing seeks \$25,249.40 in expenses incurred during the Application Period. Expenses included postage; photocopying; cab fare, rail transportation, mileage, and parking incurred in traveling to key case events; filing fees; court costs; Federal Express; and legal research. For legal research, Saul Ewing maintains flat fee contracts with Westlaw. As a general matter, and in the present case, Saul Ewing charges all clients (bankruptcy and non-bankruptcy) on whose behalf legal research is undertaken the amounts that Westlaw charge to regular users (i.e., users that do not maintain flat fee contracts) on a basis that is tied to the actual length of usage for each research session; however, Saul Ewing then applies a 50% discount to the amounts charged to its clients. In applying such discounted charges to its clients, Saul Ewing passes the benefits of the flat fee arrangement on to its clients while also maintaining a revenue neutral arrangement under its contract with Westlaw; specifically, Saul Ewing does not derive a profit from such legal charges.

WHEREFORE, Saul Ewing respectfully requests authorization to be paid by the Debtors \$225,887.50 for legal services rendered on behalf of the Debtors during the Application Period, together with reimbursement of \$25,249.40 in expenses incurred during the Application Period

Dated: August 8, 2025

SAUL EWING LLP

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